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Attorneys for Plaintiff United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$141,513.00 IN U.S.
CURRENCY,

Defendant.

CASE NO. 1:21-MC-00069-AWI-BAM

STIPULATION AND ORDER FURTHER
EXTENDING TIME FOR FILING A COMPLAINT
FOR FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

The United States of America and potential claimant Sergiy Krystafovych (“potential claimant”),
by and through their counsel, do agree and STIPULATE as follows:

1. On or about May 5, 2021, potential claimant filed a claim in the administrative forfeiture
proceeding with the U.S. Customs and Border Protection with respect to the above-captioned currency
(hereafter “defendant currency”), which was seized on August 25, 2020.

2. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit
required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
than the potential claimant has filed a claim to the defendant currency as required by law in the
administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was August 2, 2021.

4. By Stipulation and Order filed August 2, 2021, the parties stipulated to extend to October 31, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant property and/or to obtain an indictment alleging that the defendant property is subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to December 30, 2021, the time in which the United States is required to file a civil complaint forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant property and/or to obtain an indictment alleging that the defendant property is subject to forfeiture shall be extended to December 30, 2021.

Dated: October 22, 2021

PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ Alyson A. Berg
ALYSON A. BERG
Assistant United States Attorney

Dated: October 22, 2021

By: /s/ Jakrun Sodhi
JAKRUN SODHI
Attorney for Sergiy Krystafovych
(Original signature retained by attorney)

IT IS SO ORDERED.

Dated: October 25, 2021



SENIOR DISTRICT JUDGE